

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS - DALLAS DIVISION**

CITY OF DALLAS,
Plaintiff,

v.

TRIPLE D GEAR, LLC,
Defendant.

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Case No. 3:23-cv-02367-K

DEFENDANT TRIPLE D GEAR, LLC'S WITNESS LIST

Defendant Triple D Gear, LLC expects to call the following witnesses to give testimony.

1. Probable Witness / Record Custodian - Alfredo Arturo Sanchez, President and CEO of Triple D Gear, LLC; 4653 Nall Rd, Farmers Branch, TX 75244; (469) 816-1800. Mr. Sanchez will testify regarding the factual and history of the trademark applications in question, including the history of Defendant and its related companies.
2. Possible Witness - David Small; 501 Elm St, Dallas, TX 75202; 214-965-9400. Mr. Small was counsel involved in the trademark registrations sought to be canceled.
3. Expert Witness - Warren V. Norred, 515 E. Border, Arlington, Texas, as an expert regarding fees (if appropriate and necessary).

Defendant also reserves the right to call any witness called by Plaintiff.

Respectfully submitted,

/s/ Warren V. Norred

Warren V. Norred; Texas Bar No. 24045094, wnorred@norredlaw.com

Norred Law, PLLC; 515 E. Border; Arlington, Texas 76010

P: 817-704-3984

Attorney for Defendant

CERTIFICATE OF SERVICE - I certify that on April 14, 2025 the foregoing was served upon all parties seeking electronic service in the instant case.

/s/ Warren V. Norred

Warren V. Norred